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GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, *et al.* individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DEFENDANT GOOGLE LLC'S
[PROPOSED] ORDER GRANTING
OMNIBUS MOTION TO SEAL
PORTIONS OF [DKT. 470, 478, 485]**

Date: May 15, 2025

Time: 1:30 p.m.

Ctrm: 3 - 17th Floor

Judge: Hon. Richard Seeborg

Action filed: July 14, 2020

Trial Date: August 18, 2025

[PROPOSED] ORDER

Before the Court is Google LLC's Statement in Support of Omnibus Motion to Seal Portions of Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Google's Experts ("*Daubert* Motion") (Dkt. 473), Google's Opposition thereto (Dkt. 488), Plaintiffs' Opposition to Google's Motion to Exclude Sundar Pichai from Testifying at Trial ("Pichai Opp.") (Dkt. 479), and Google's Reply thereto ("Google's Pichai Reply") (Dkt. 487) and documents filed in connection with that motion.

Plaintiffs' Opposition to Google's Motion to Exclude Sundar Pichai from Testifying at Trial (Dkt. 479)

Exhibit	Bates No. / Pages with Designations	Description
Exhibit 01	GOOG-RDGZ-00085183	Employee PII, Internal term Su***
Exhibit 02	GOOG-RDGZ-00035752 (Entire Document)	Internal product updates, Employee PII
Exhibit 03	GOOG-RDGZ-00164255	Employee PII, Internal term Su***
	GOOG-RDGZ-00164256	Internal term Su***
Exhibit 04	GOOG-RDGZ-00018661 (Entire Document)	Internal processes, Internal terms, Employee PII
Exhibit 08	GOOG-RDGZ-00056947, GOOG-RDGZ-00056951	Employee PII
	GOOG-RDGZ-00056978	Internal term Ca***
	GOOG-RDGZ-00056951, GOOG-RDGZ-00056987	Internal statistics

Exhibit	Bates No. / Pages with Designations	Description
Exhibit 09	GOOG-RDGZ-00076980	Employee PII
	GOOG-RDGZ-00076981	Employee PII, Internal processes
	GOOG-RDGZ-00076982	Internal processes
Exhibit 10	GOOG-RDGZ-00163898 (Entire Document)	Sensitive personnel information, Employee PII, Internal processes
Exhibit 11	GOOG-RDGZ-00057867, GOOG-RDGZ-00057917	Employee PII
	GOOG-RDGZ-00057885 to GOOG-RDGZ-00057887, GOOG-RDGZ-00057889, GOOG-RDGZ-00057891, GOOG-RDGZ-00057893 to GOOG-RDGZ-00057898, GOOG-RDGZ-00057900 to GOOG-RDGZ-00057913, GOOG-RDGZ-00057915,	Internal strategy
Exhibit 12	GOOG-RDGZ-00060716 - GOOG-RDGZ-00060750	Previously adjudicated, Dkt. 445
	GOOG-RDGZ-00060756	Employee PII
	GOOG-RDGZ-00060763 to GOOG-RDGZ-00060766	Sensitive customer data
Exhibit 13	GOOG-RDGZ-00152787, GOOG-RDGZ-00152794	Employee PII

Exhibit	Bates No. / Pages with Designations	Description
Exhibit 14	GOOG-RDGZ-00020740 to GOOG-RDGZ-00020742	Previously adjudicated, Dkt. 186
Exhibit 15	GOOG-RDGZ-00116916, GOOG-RDGZ-00116918	Employee PII
Exhibit 16	GOOG-RDGZ-00131086 to GOOG-RDGZ-00131090	Employee PII
Exhibit 17	GOOG-RDGZ-00160904	Employee PII
Exhibit 18	GOOG-RDGZ-00145362	Employee PII
Exhibit 19	GOOG-RDGZ-00130078 (Entire Document)	Confidential business information, Internal processes, Internal statistics
Exhibit 20	GOOG-RDGZ-00127151	Employee PII, Confidential business information
	GOOG-RDGZ-00127152	Confidential business information
Exhibit 22	GOOG-RDGZ-00171250 to GOOG-RDGZ-00171254	Employee PII
Exhibit 24	Google's Fourth Supplemental Responses and Objections to Plaintiffs' Interrogatories, Set One	Previously adjudicated, Dkt. 293-4
Exhibit 26	GOOG-RDGZ-00087672	Employee PII, Internal terms
Exhibit 27	GOOG-RDGZ-00177701 (Entire Document)	Internal statistics

Exhibit	Bates No. / Pages with Designations	Description
Exhibit 28	GOOG-RDGZ-00061531 to GOOG-RDGZ-00061532	Employee PII, Internal terms
Exhibit 29	GOOG-RDGZ-00046121, GOOG-RDGZ-00046123, GOOG-RDGZ-00046124, GOOG-RDGZ-00046125, GOOG-RDGZ-00046128, GOOG-RDGZ-00046129, GOOG-RDGZ-00046130, GOOG-RDGZ-00046131, GOOG-RDGZ-00046134, GOOG-RDGZ-00046135	Employee PII
	GOOG-RDGZ-00046126, GOOG-RDGZ-00046136 to GOOG-RDGZ-00046143	Internal terms, Confidential business information, Employee PII
Exhibit 30	GOOG-RDGZ-00117801, GOOG-RDGZ-00117802	Employee PII
Exhibit 31	GOOG-RDGZ-00127803, GOOG-RDGZ-00127804	Employee PII
Exhibit 32	GOOG-RDGZ-00127840	Employee PII
	GOOG-RDGZ-00127845	Employee PII, Internal statistics
Exhibit 33	GOOG-RDGZ-00188868 (Entire Document)	Confidential business information, , Employee PII
Exhibit 34	GOOG-RDGZ-00203483, GOOG-RDGZ-00203485 to GOOG-RDGZ-00203487, GOOG-RDGZ-00203489 to GOOG-RDGZ-00203490	Employee PII
	GOOG-RDGZ-00203484	Employee PII, Internal statistics

Exhibit	Bates No. / Pages with Designations	Description
Exhibit 35	GOOG-RDGZ-00039515 (Entire Document)	Internal processes, Employee PII
Exhibit 36	GOOG-RDGZ-00153597 (Entire Document)	Confidential business information, sensitive personnel information
Exhibit 37	GOOG-RDGZ-00017489 (Entire Document)	Internal processes
Exhibit 39	GOOG-RDGZ-00014597, GOOG-RDGZ-00014599	Employee PII
Exhibit 44	GOOG-RDGZ-00158221	Employee PII

Google's Reply in Support of its Motion to Exclude Sundar Pichai (Dkt. 487)

Exhibit	Bates No. / Pages with Designations	Description
Google LLC's Reply in Support of its Motion to Exclude Sundar Pichai from Testifying at Trial	3:2-4	Internal term Su***
Appendix A to Google LLC's Reply ISO Motion to Exclude Sundar Pichai from Testifying at Trial	1:3	Internal term Su***

Plaintiffs’ Motion to Exclude Certain Opinions and Testimony of Google’s Experts (Dkt. 473)

Exhibit	Bates No. / Pages with Designations	Description
Exhibit 6 to Plaintiffs’ <i>Daubert</i> Motion	5:23, 165:22, 173:10	Internal term Pr***Un***
	7:16-17	Internal term Pr***Al***

Google’s Opposition to Plaintiffs’ Motion to Exclude Certain Opinions and Testimony of Google’s Experts (Dkt. 488)

Exhibit	Bates No. / Pages with Designations	Description
Exhibit B to the Decl. of Santacana ISO Google’s Opp. to Plaintiffs’ <i>Daubert</i> Motion	GOOG-RDGZ-00186830, GOOG-RDGZ-00186837, GOOG-RDGZ-00186838	Employee PII

Having considered Google’s Statement in Support of Omnibus Motion to Seal Portions of Plaintiffs’ Motion to Exclude Certain Opinions and Testimony of Google’s Experts (“*Daubert* Motion”) (Dkt. 473), Google’s Opposition thereto (Dkt. 488), Plaintiffs’ Opposition to Google’s Motion to Exclude Sundar Pichai from Testifying at Trial (“*Pichai* Opp.”) (Dkt. 479), and Google’s Reply thereto (“Google’s *Pichai* Reply”) (Dkt. 487) and the Declaration of David Monsees, the Court finds that.

IT IS SO ORDERED.

DATED: _____

Honorable Richard Seeborg
United States District Judge